Judgment is hereby entered.

<u>s/ Benita Y. Pearson on 4/4/2018</u>

U.S. District Judge

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

| SANDRA COPELAND, |) | CASE NO. 4:17-cv-01187-BYP |
|-------------------------------------|--------|--|
| Plaintiff, |) | |
| vs. |) | JUDGE BENITA Y. PEARSON |
| HCC LIFE INSURANCE COMPANY, ET AL., |) | DEFENDANT HEALTH INSURANCE INNOVATIONS, INC.'S OFFER OF |
| Defendants. |)) | JUDGMENT TO PLAINTIFF SANDRA COPELAND |

Defendant, Health Insurance Innovations, Inc., pursuant to Fed. R. Civ. P. 68, offers to allow the entry of judgment in this action as follows:

- 1. This offer is made for the purpose set forth in Fed. R. Civ. P. 68 by Defendant, Health Insurance Innovations, Inc., to Plaintiff, Sandra Copeland.
- 2. Judgment in this action shall be entered on Count One (Negligent Procurement) of the Second Amended Complaint in favor of Plaintiff and against Defendant, Health Insurance Innovations, Inc., in the amount of \$100.00, which shall include any and all claims for damages, attorney's fees, costs or other relief.
- 3. Plaintiff must make timely acceptance of this offer within fourteen (14) days of service in accordance with Fed. R. Civ. P. 68, or this offer shall be deemed withdrawn.
- 4. Plaintiff's acceptance of this offer shall effect an entry of judgment, under Fed. R. Civ. P. 54, dismissing with prejudice all of Plaintiff's claims in this action against Defendant, Health Insurance Innovations, Inc.

- 5. This offer shall not be construed as an admission that Defendant, Health Insurance Innovations, Inc., is liable to Plaintiff in this action or otherwise, or that Plaintiff has suffered any damages.
- 6. In the event this offer is not accepted and Plaintiff does not obtain a judgment more favorable than this offer, Defendant, Health Insurance Innovations, Inc., will seek payment from Plaintiff for the costs incurred after the offer is made.

Dated: March 16, 2018

Garry W. O'Donnell, Esq. (0032926)

Email 1: garry.odonnell@gmlaw.com Email 2: jaye.keckeis@gmlaw.com GREENSPOON MARDER LLP

One Boca Place

2255 Glades Road, Suite 400-E

Boca Raton, Florida 33431

Telephone: (561) 994-2212 x1567

Facsimile: (561) 807-7527

Attorneys for Defendant, Health Insurance

Innovations, Inc.

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on this 16th day of March, 2018, the foregoing Offer of Judgment was served via email and U.S. Mail to:

Martin F. White, Esq.

Email: MFW850@aol.com
MARTIN F. WHITE CO., L.P.A.
156 North Park Avenue
P.O. Box 1150

Warren, Ohio 44482-1150 Telephone: (330) 394-9692 Facsimile: (330) 394-8589

Attorneys for Plaintiff, Sandra Copeland

By: Garry W. O'Donnell, Esq.